

Preparing for an EPA Risk Management Plan Inspection

Notification:

One afternoon you stop by the mail slots and find a certified letter addressed to you from the Environmental Protection Agency. Upon opening the letter, you find that the EPA is giving you notice of a pending inspection of your facility. They have given you a week to prepare for the visit and have provided some guidance as to what should be done to be ready for the inspection. The EPA provides this guidance to reduce the amount of time that the inspection will take you or your employees away from their regularly scheduled activities. Most Risk Management Plan inspections are completed in approximately four hours. The letter outlines several things that you need to do to be prepared for the inspection. Let's review them.

What is involved:

Please note that the majority of time spent during a RMP inspection involves a comprehensive review of the paperwork (Documentation). The amount of documentation needed is normally driven by the specific program level of your facility (Program 1, 2, or 3) and the complexity of your process. If the operation involves simply transferring the regulated chemical from a rail car to smaller containers that are to be shipped to the end user, the process is more than likely fairly simple and has few process steps. Items such as operating procedures, written maintenance procedures, process hazard analysis, etc. will be relatively simple. However, if the process involves using the chemical as a feedstock for manufacturing or for a refrigeration cycle such as anhydrous ammonia, the procedures and documentation, will be much more complex.

Preparation:

It is best to arrange to have an area or room set aside for the inspection conferences and records review. EPA inspectors try to allow time for an opening briefing and a closing conference. Establishing an area for these activities is key to assuring that the inspection will proceed in a timely manner. You should obtain a copy of the inspection checklist (Program 1, Program 2, or Program 3) specific to your program level from the EPA Region 10 web site or you can telephone and request one from the RMP Coordinator.

The inspection:

The inspection normally begins with an EPA introduction and the purpose of the inspection. Your facility will be asked for an explanation of facility operations which addresses the overall facility activities and describes the regulated process/processes. When the introduction and operations review are complete, your facility should provide a safety briefing for EPA personnel. Then a tour of the facility, guided by your personnel and concentrating on the covered process/processes will be conducted. The inspection team will ask questions and photograph equipment that is involved with the regulated process. You can request copies of the photos or have someone take duplicate photos. The inspection team will try to avoid photographing equipment that would/could reveal trade secrets or privileged information.

Documentation review:

After the tour is completed the inspection team will initiate the review of the documentation required to support and verify that actions required in the Risk Management Program. The team follows the program checklist that addresses each of

the elements of the program level that corresponds with your process. This information includes but is not limited to your Hazard Assessment (Worst Case and Alternative release scenarios) and your RMP prevention program documentation. You should obtain a copy of the checklist and assemble the information prior to the day of the inspection. You should also make someone available to the team that is knowledgeable with the RMP documentation and the covered process. This could involve more than one individual depending on the size and complexity of the process.

Closing briefing:

After the inspection team has completed a review of the documentation, a closing briefing will be conducted. During this briefing the team will outline its findings and when appropriate provide guidance in compliance with the Risk Management Plan requirements. You should be prepared to take comprehensive notes of the discussion and ask questions when necessary. You will also be given an opportunity to provide follow-up information such as documentation that was not available at the time of the inspection. However, you have one week from the day of the inspection to provide the documentation.

Summary:

Preparation for an EPA Risk Management Plan inspection will make the experience more productive and will reduce the amount of time from your normal business activities. The checklists are available on EPA Region 10's web site as guidelines for your preparation. If you have any questions, you can contact the EPA Region 10 Risk Management Plan coordinator, Javier Morales, at 206 553-1255.